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amta
american massage therapy association

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November 9, 2010

Mr. Arthur Coccodrilli, Chairman
Independent Regulatory Review Commission
333 Market Street, 14th floor
Harrisburg, Pa 17101

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Chairman Coccodrilli:

On behalf of the American Massage Therapy Association (AMTA) and the AMTA-Pennsylvania Chapter, we are writing to express our concerns regarding the final regulations relating to the practice of massage therapy. AMTA is a professional membership association representing more than 56,000 member massage therapists nationally and 1,700 members in our Pennsylvania Chapter.

Of particular concern are the recent changes to §20.41. It is the view of AMTA that the original language of §20.41, submitted to the Independent Regulatory Review Commission (IRRC) April 27, 2010, provided acceptable clarity regarding the treatment of soft tissue manifestations. The changes to §20.41, while consistent with statute, do not provide the same clarity regarding the same. This lack of clarity may negatively impact practitioners. Without such clarity, practitioners have no guidance to ensure they maintain practices within the established regulations.

Massage therapy can have a significant impact on an individual's health and well-being. It is in the best interest of the profession and the general public to ensure clarity in massage therapy regulations. While we are expressing our concerns regarding this lack of clarity, we do not want to preclude the regulations from moving forward at this time. We would like to request the State Board of Massage Therapy take our concerns into consideration in future actions.

Thank you for your time and consideration.

Sincerely,

William J. Brown
Government & Industry Relations Director
American Massage Therapy Association

Brenda Schuck
President
AMTA-Pennsylvania Chapter

CC: Robert C. Jantsch, Chairperson, State Board of Massage Therapy